

**EPA Comments on the draft
Surface Water Treatability Study Technical Memorandum,
Smoky Canyon Mine**

General Comment:

The introductory paragraphs in Section 4.0, Evaluation of Technologies for Use at the Smoky Canyon Mine, state that a feasibility study screening evaluation ranks technologies with respect to effectiveness, implementability, and cost. These are good criteria to determine during the scoping process if technologies are potentially applicable to the cleanup envisioned at a site and to determine if a technology should be retained as an alternative. However, this is not a feasibility screening study but a treatability study of technologies. One of the main purposes of a treatability study is to generate sufficient information to permit the evaluation of the technology(ies) against the nine criteria in a detailed analysis of alternatives. Effectiveness, implementability, and cost represent just three of the nine criteria.

It appears that this report is proposing remedy selection treatability studies. EPA's Guidance for Conducting Treatability Studies Under CERCLA (1992) states such studies address several test objectives which are designed to provide specific cost and engineering information in addition to more general guidelines such as protection of human health and the environment and compliance with ARARs and ability to achieve quantitative performance goals based on anticipated cleanup criteria should be provided by such studies. Thus the information gathered by these studies should provide data that allows for the detailed analysis of alternatives that address seven of the nine criteria. These criteria are; overall protection of human health and the environment, compliance with ARARs, long term effectiveness and permanence, reduction of toxicity, mobility, and volume through treatment, short term effectiveness, implementability and costs. Cost data should be sufficiently detailed to allow for the development of cost estimates with an accuracy of +50 to -30 percent.